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LATHAM & WATKINS LLP

December 20, 2023

VIA ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

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Re: *Sjunde AP-Fonden et al. v. Gen. Elec. Co. et al.*, No. 1:17-cv-8457 (JMF)

Dear Judge Furman:

On behalf of Defendants General Electric Company (“GE”) and Jeffrey S. Bornstein, we write pursuant to Rule 7.C. of the Court’s Individual Rules and Practices in Civil Cases for leave to: (i) publicly file Defendants’ memorandum of law in support of their motions *in limine* in redacted form; and (ii) file the unredacted form of Defendants’ memorandum of law under seal.

Specifically, Defendants seek leave to redact references to confidential information contained in documents that are the subject of their previously filed and currently pending motions to seal, *see* ECF No. 417, including ECF Nos. 358-002 (DX 511), 358-018 (PX 225), 358-022 (Kothari Rep.), 358-023 (Tabak Rep.), 385-014 (PX 199), 385-018 (PX 373), 385-027 (PX 4), 385-156 (PX 263), and 385 ¶ 3 (PX 265). For the same reasons stated in their prior letter motions,¹ Defendants respectfully request leave to redact references to the confidential information contained in these documents in their memorandum of law.

Defendants appreciate the Court’s time and attention to this matter.

The motion to seal is temporarily GRANTED. The Court will assess whether to keep the materials at issue under seal or redacted when deciding the underlying motions. The Clerk of Court is directed to terminate ECF No. 435. SO ORDERED.

Respectfully submitted,



William J. Trach
of Latham & Watkins LLP

December 26, 2023

cc: All counsel of record (via ECF)

¹ In the interest of judicial economy and to avoid redundancy in their filings, Defendants respectfully refer the Court to their prior letter-motions concerning these documents and the confidential information contained therein. *See* ECF Nos. 348, 386, 394.